

PETER R. PASTRE
VICE PRESIDENT, GOVERNMENT RELATIONS AND PUBLIC POLICY



May 10, 2022

The Honorable Carolyn B. Maloney
Chairwoman
Committee on Oversight and Reform
House of Representatives
Washington, DC 20515-6143

The Honorable James R. Comer
Ranking Member
Committee on Oversight and Reform
House of Representatives
Washington, DC 20515-6143

Dear Chairwoman Maloney and Ranking Member Comer:

On May 11, 2022, the Committee will consider the Ensuring an Accurate Postal Fleet Electrification Act. This bill, if adopted as presently drafted, would significantly disrupt the Postal Service's current acquisition of the Next Generation Delivery Vehicle (NGDV) fleet and, consequently, would endanger delivery to your constituents, entail significant financial costs, and force needless delay to accomplish little or no change in a thoroughly researched and designed delivery vehicle program.

In the immediate wake of Postal Reform enactment, the lynchpin of which was providing financial breathing room for the Postal Service, we are extremely concerned that this proposal would again jeopardize the Postal Service's financial stability and operations, as well as negative impact to the women and men of the Postal Service through what is essentially another unfunded mandate from Congress. The NGDV program is an important investment component of the Delivering for America 10-year plan of transformation. Even a brief delay, much less a significant year or two delay, would be a counterproductive move away from service excellence. And from an environmental perspective, a delay would leave 30-year-old environmentally and employee-unfriendly vehicles - a significant portion of which are scheduled to be replaced with Battery Electric Vehicles (BEVs) starting next year - operating that much longer in America's neighborhoods.

Vehicle manufacturers are facing significant delays in obtaining components and skyrocketing costs - particularly electric vehicle components - and any delay would put the Postal Service significantly behind other vehicle buyers in the acquisition process. Furthermore, the cost of vehicles (particularly BEVs) would continue to escalate, costing the Postal Service hundreds of millions - if not billions of dollars - depending on the length of delay and the harm to our supplier. Our March vehicle order was for 50,000 vehicles, 10,019 of which will be BEV. Any delay of this order will set back any subsequent BEV orders, which we assume is contrary to the purpose of the bill.

As you well know, the Committee conducted an oversight hearing¹ to examine the NGDV program on April 5. As was described by the Postal Service's expert witness and the other

¹ House Committee on Oversight and Reform Hearing: "It's Electric: Developing the Postal Fleet of the Future" April 5, 2022; Victoria K. Stephen, Executive Director Next Generation Delivery Vehicle (NGDV) program, testifying on behalf the U.S. Postal Service.

hearing panelists, there is an urgent need for new delivery vehicles and the Postal Service has undertaken a years-long effort to evaluate and select the best path forward.

The need for the NGDVs is pressing. Many of our 190,000 delivery vehicles have been on the road for more than 30 years and lack basic safety features, including air conditioning, air bags, and anti-lock brakes. These vehicles also do not incorporate the most modern thinking in ergonomic design, which would contribute to the health and safety of our employees. We have an urgent need to replace these vehicles and mitigate the daily operational, maintenance, environmental and direct cost impacts associated with supporting our current delivery fleet. The women and men who operate the delivery fleet have waited long enough.

As to the issue of the Environmental Impact Statement (EIS) referenced by the bill, we would generally refer to the testimony offered in your committee's hearing describing our efforts: "We are proud of the thousands of hours that have been devoted to the NGDV EIS. It is a thorough, professional record of our efforts to take a hard look at the NGDV's environmental impacts, consider reasonable alternatives and mitigation, and consult the public and agencies such as CEQ and EPA. This is what NEPA requires. It does not mandate particular results or substantive outcomes -- NEPA does not require that we select the option with the least environmental impact."

Furthermore, as we pointed out during the hearing, the criticisms of the EIS ignore our distinctive delivery profile, which requires our vehicles to travel short distances between hundreds of curbside boxes and to stop and start frequently throughout the day, which is a vastly different delivery profile than that of our competitors. Similarly, those criticisms turn a blind eye to our unique service requirements, which necessitate that we deliver mail to elevated delivery boxes on posts. These service requirements make commercial off-the-shelf vehicles particularly unsuitable for certain routes, and the right-hand drive purpose-built NGDVs we are acquiring defy cost and environmental comparison made by observers.

Legislatively negating the EIS and restarting the effort would serve little evident purpose, but would entail very significant financial costs, delay a much-needed vehicle program, and would force us to continue to rely on outdated and failing delivery vehicles to accomplish our core delivery function. The current EIS is a well-considered, thoughtful and deliberate examination of the program. The process was sound. Repeating that effort would not change the outcome, but would guarantee added time and considerable expense.

We would note as well that multiple groups have challenged the EIS in federal court, which is the proper forum for reviewing the sufficiency of an EIS. The Committee should let that process play out, and enable our supplier to proceed forward with its development work in the interim. The work that our supplier is performing now is necessary for any mix of vehicles we purchase, whether 20% BEV or 100% BEV. Any action taken to delay our supplier's work at this point is therefore not only unnecessary, but contrary to the bill's goals.

We hope that the committee will consider these views, and we look forward to working with you to address any outstanding questions regarding our NGDV program.

Sincerely,



Peter Pastre

cc: Committee on Oversight and Reform Members